

## **Exhibit D**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

PROXENSE, LLC,

Plaintiff,

vs.

SAMSUNG ELECTRONICS, CO., LTD. AND  
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Case Nos. 6:21-cv-00210-ADA

**JURY TRIAL DEMANDED**

**PLAINTIFFS' NOTICE OF DEPOSITION TO TODD BURGER**

Pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, Plaintiffs hereby provides notice that they intend to take the deposition of non-party Todd Burger (“Burger”).

Burger is instructed to testify by videotaped deposition on July 29, 2022 at 9:00am EST at the Aloft Hotel, 727 Marrett Rd. A, Lexington, MA 02421 in person. The deposition will continue from day to day, excluding Saturdays, Sundays, and holidays, until completed. The deposition will be recorded by stenographic means as well as by using video or audio recording technology.

Dated: July 26, 2022

Respectfully submitted,

By:/s/ David L. Hecht  
David L. Hecht  
Maxim Price  
Yi Wen Wu  
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*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 26, 2022, the foregoing was served via electronic mail on all counsel who have consented to electronic service.

/s/ David L. Hecht  
David L. Hecht

**IN THE UNITED STATES DISTRICT COURT  
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Defendants.

Case Nos. 6:21-cv-00210-ADA

**JURY TRIAL DEMANDED**

**PLAINTIFFS' NOTICE OF DEPOSITION TO STUART LIPOFF**

Pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, Plaintiffs hereby provides notice that they intend to take the deposition of non-party Stuart Lipoff ("Lipoff").

Lipoff is instructed to testify by videotaped deposition on August 3, 2022 at 9:00am PST, at the offices of Quinn Emanuel Urquhart & Sullivan, LLP, 555 Twin Dolphin Dr., 5th Floor, Redwood Shores, California 94065 in person. The deposition will continue from day to day, excluding Saturdays, Sundays, and holidays, until completed. The deposition will be recorded by stenographic means as well as by using video or audio recording technology.

Dated: July 26, 2022

Respectfully submitted,

By:/s/ David L. Hecht  
David L. Hecht  
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*Counsel for Plaintiffs*

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David L. Hecht

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Case Nos. 6:21-cv-00210-ADA

**JURY TRIAL DEMANDED**

**PLAINTIFFS' NOTICE OF DEPOSITION TO BRAD FRIEDLANDER**

Pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, Plaintiffs hereby provides notice that they intend to take the deposition of non-party Brad Friedlander (“Friedlander”).

Friedlander is instructed to testify by videotaped deposition on August 1, 2022 at 8:00am EST at the Holiday Inn Express, 8 Independence Dr., Chelmsford, MA. 01824 in person. The deposition will continue from day to day, excluding Saturdays, Sundays, and holidays, until completed. The deposition will be recorded by stenographic means as well as by using video or audio recording technology.

Dated: July 26, 2022

Respectfully submitted,

By:/s/ David L. Hecht

David L. Hecht

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*Counsel for Plaintiffs*

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/s/ David L. Hecht  
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